



Transportation
Security
Administration

**U.S. DEPARTMENT OF HOMELAND SECURITY
TRANSPORTATION SECURITY ADMINISTRATION**

HUMAN RESOURCES MANAGEMENT POLICY MANUAL

HRM BULLETIN NO. 300-13

DATE: April 19, 2005

SUBJECT: Interim Guidance on Diploma Mills

1. Summary

Identifying and eliminating the use of fraudulent academic degrees, certifications or credentials is in the best interest of every Federal employee and is critical to ensuring that TSA employees have the necessary, legitimate qualifications to secure the safety of our Nation. TSA will not fund or accept degrees, certifications or credentials that are counterfeit or are obtained from non-accredited institutions, including "diploma mills".

2. Questions and Answers

The following questions and answers provide more information on this topic.

What are "Diploma Mills"?

Diploma mills are non-traditional schools that are not accredited by accrediting institutions recognized by the United States Department of Education (DoED). Diploma mills generally award degrees with little or no coursework. These institutions award degrees or certificates based on an assessment of the student's life experience or cash payments and may translate those experiences into fraudulent curriculum transcripts, giving a false impression of a structured curriculum. In addition, some organizations sell counterfeit degrees and/or transcripts that appear to be from recognized and legitimate educational institutions, and these fraudulent academic credentials are also of concern.

What is accreditation and why is it important?

Accrediting agencies are private educational associations that develop evaluation criteria and conduct peer evaluations to assess whether or not those criteria are met. Institutions and/or programs that request an accrediting agency's evaluation and meet their criteria are then "accredited" by that agency.

Accreditation is like a "seal of approval" for education. Accreditation helps ensure that education provided by institutions meets acceptable levels of quality. The DoED does not accredit educational institutions and/or programs but it does publish a list of nationally recognized accrediting agencies.

Does education have to be from an accredited school?

In most cases yes, but there are a few exceptions.

There are four general categories of higher education:

1. **Conventional/Accredited:** Degree-granting schools that are accredited by accrediting agencies recognized by the Secretary of Education.
2. **Non-Accredited/Pending Accreditation:** Schools that are not accredited by an accrediting agency recognized by DoED; but offer a curriculum for advanced learning similar to a conventional/accredited institution; and are in the process of seeking accreditation from an organization recognized by DoED and have received "pre-accreditation" or "candidate for accreditation" status.
3. **Non-Accredited/Other:** Schools that generally have a traditional curriculum but have chosen not to seek accreditation and thus do not qualify under category 1 or 2. In addition, foreign institutions that offer courses of study comparable to institutions accredited by organizations recognized by DoED fall in this group. These institutions may be accredited by appropriate organizations in their home country, but not by agencies recognized by DoED.
4. **Non-Qualifying:** Non-traditional schools that are not accredited by accrediting agencies recognized by the Secretary of Education and that may award degrees or certificates with little or no course work completed by the student. Education is considered Non-Qualifying if it is determined that it is not equivalent in content to Conventional/Accredited higher education programs. This group includes diploma mills and organizations that simply sell counterfeit degrees.

Based on these four categories of higher education (Conventional/Accredited, Non-Accredited/Pending Accreditation, Non-Accredited/Other, and Non-Qualifying), the applicability of each category to the following activities is explained in the table below.

Activity	Consideration For	Conventional/ Accredited	Non-Accredited/ Pending Accreditation	Non- Accredited/ Other	Non- Qualifying (includes Diploma Mills)
Student Loan Repayment*	<i>Pay</i>	Yes	No	No	No
Academic Degree Training Program	<i>Training</i>	Yes	No	No	No
Tuition Reimbursement or Employee Training	<i>Training</i>	Yes	Yes	Yes	No
Position Qualification Requirements (including Student Educational Employment Programs (SEEP))	<i>Qualification</i> <i>(Eligibility for SEEP)</i>	Yes	Yes (No for SEEP)	No	No

* agency policy not yet issued

Why is this issue important?

The Senate Committee on Governmental Affairs and the House Committee on Government Reform, and the General Accounting Office conducted investigations on this issue and have instructed the Office of Personnel Management (OPM) to review how these degrees relate to Federal employment. OPM has asked that agencies become alert to this issue. The Federal Government's position is clear: there is no place in Federal employment for degrees or credentials from diploma mills.

What do I need to know?

As an employee, supervisor or manager:

- You cannot use degrees and/or credentials from non-accredited institutions or diploma mills to qualify for Federal jobs (including initial appointment, promotion, or reassignment);
- Claiming degrees and/or credentials from diploma mills on employment applications and/or government forms (such as the Standard Form 86, Questionnaire for National Security Positions) may constitute a fraudulent claim and is considered dishonest behavior or conduct. Such conduct will have an adverse impact on your suitability for Federal employment, and/or your security clearance eligibility;
- You may not send employees to diploma mills for degrees or any other form of education/training; and
- You may not approve the reimbursement for tuition assistance associated with these schools or repay student loans (after student loan repayment policy is issued) if the degree is from a non-accredited institution or diploma mill.

What can happen?

The appropriate action depends on whether the individual intentionally falsified a form and whether the person qualifies for the position without the fraudulent or diploma mill credential/degree. Other considerations include: whether the individual received an unfair advantage over others by claiming the credential/degree; whether the person holds a security clearance; and whether the person should continue to remain employed even if the claim was not material to the initial employment decision. Under 18 USC 1001, a false statement on any part of the Federal application may be punished by fine or imprisonment.

Regardless of whether or not the fraudulent degree or education claimed was required to qualify for a position, the dishonest conduct displayed will put the person's continued employment in jeopardy if the position occupied requires a security clearance. Dishonest conduct has a direct impact on clearance eligibility, and if a person is determined ineligible for a security clearance, they are ineligible to occupy the sensitive position.

If a Federal employee commits fraud, falsifies credentials or dishonestly represents credentials, the Government can:

- Debar (prohibit the person from obtaining Federal employment) for a period of up to three years;
- Take administrative or disciplinary action, including demotion, reassignment or removal; and/or
- Cancel pending applications or eligibilities.

How can I find a list of accredited Colleges/Universities or tell which ones are diploma mills?

The DoED has created the following web site that provides a master list of accredited colleges, universities and career and trade schools to use as an initial source of information:

<http://www.ope.ed.gov/accreditation>

Some additional web sites that can help you find many accredited schools include:

<http://www.ed.gov/admins/finaid/accred/index.html>

<http://nces.ed.gov/ipeds/cool/>

<http://www.chea.org/>

<http://www.aacrao.org/credential>

Note: If the school you are searching for is not represented on any of these above lists, that school may still be accredited, but you will need to do further research to verify its accreditation status.

You can also learn more about education from foreign schools from:

<http://www.ed.gov/about/offices/list/ous/international/usnei/edlite-index.html>

Some web sites with more information on diploma mills include:

www.degree.net

<http://www.osac.state.or.us/oda>

Other sources of information on this topic:

Crediting education in meeting qualification requirements for Federal positions:

<http://www.opm.gov/qualifications/SEC-II/s2-e4.htm>

OPM Qualifications Standards Branch : (202) 606-1696

U.S. Department of Education: (202) 219-7011

OPM Suitability Adjudications Branch: (724) 794-5612

What should I do if I am currently a student at, or have credentials from, a “diploma mill”?

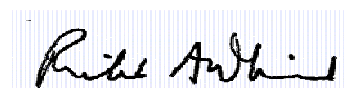
You may choose to continue your course of study, but you may not receive reimbursement from TSA for any costs. If you received a degree, you cannot use it for promotion or to qualify for another job. If you have a Security Clearance or are required to obtain one in the future, you should not list it on the clearance application form.

Where do I go if I have questions?

For questions about training requests/approvals, contact your local Training Coordinator.

For questions concerning employment, contact your servicing HR specialist.

For questions about credentialing and/or security clearances, contact the Office of Transportation Vetting and Credentialing (OTVC).



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